

The disclosure from Billy Madison, however, like the previously cited movie, differs significantly from the subject matter of the present claims. Both Billy's girlfriend (the teacher) and the bus driver are physically present in the same location as Billy. They are neither present at a remote location that is accessed on-line, nor are presented as recorded images from a video file. Furthermore, similarly to the situation with the previously cited movie (Major League), Billy does not provide any *instructions* to either his girlfriend or the bus driver. In particular, Billy, like the coach in Major League, does not provide any instructions to *remove an article of clothing*. Rather, both Billy's girlfriend and the bus driver appear spontaneously to begin removing their clothing without any suggestion, let alone instruction, from Billy to do so. Moreover, both Billy's girlfriend and the bus driver determine when the answer is correct, and then select the article of clothing to be removed themselves.

Turning once again to present claim 44, the claimed method includes the specific steps of "b) providing to a central cite via a network i) an answer to at least one question, and ii) an instruction directing a model to remove an article of clothing when the central cite determines that the answer so provided is correct, and c) viewing via the network a model removing the article of clothing upon determination by the central cite that the answer provided in step b) is correct." Thus, the method requires that an *instruction* be provided *to a model*, that the instruction be provided *via a network*, that the instruction *direct the model* to remove an article of clothing, and that the removal be carried out *when the central cite determines* that a correct answer is provided. As demonstrated above, neither Billy Madison nor the other references of record disclose, suggest or even contemplate such a method. Billy Madison fails to disclose or suggest providing instructions to a model, directing the model to remove an article of clothing in response to a correct answer, or viewing such a removal by the model when a central site determines that the desired answer is provided. Applicants once more emphasize that the particular steps of instructing a live model to remove an article of clothing, and viewing the model doing so when the central cite determines that a correct answer is provided, are not suggested by Billy's girlfriend, e.g., removing articles of her clothing when she herself determines that Billy has provided a correct answer, without any input from Billy. The teachings of the cited references thus must be considered incapable of having rendered present claim 44 obvious. Withdrawal of the rejection on this basis is courteously requested.

Turning to claim 45, the limitations that ***a link to a model site be opened***, that ***an article of clothing be selected for removal by a model***, that this selection be made ***in response to notification from a central site*** that a correct answer has been provided, and that the clothing removal be ***viewed via a network***. None of the foregoing limitations are suggested by Billy Madison, nor by any other cited reference. Claim 45 thus cannot be considered obvious under §103 in view of the cited teachings. Withdrawal of the rejection on this basis is respectfully urged.

With respect to dependent claims 50 and 62, Billy Madison fails to disclose or suggest any of the additional limitations set forth in these claims, including determination by the educational application when a correct answer is provided (claim 50) or receipt of a request for selection of the article of clothing from the educational application (claim 62). Claims 50 and 62 are distinguished for these additional reasons.

Similar reasoning again indicates that claims 64-66 and 69 are not suggested by Billy Madison or the rest of the cited art. Applicants once more respectfully request withdrawal of the rejections of the foregoing claims.

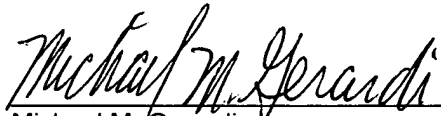
With respect to dependent claims 72-81, the foregoing reasoning also applies. Applicants note that neither Billy Madison nor any of the other cited art disclose or suggest that an educational application provide a model site with an instruction for the model to remove the selected article of clothing (claims 72 and 77); to control access to the model site based on the physical location of the accessing site (claim 73); to provide a premium including a discounted or free admission to an establishment (claim 75) or a discounted or free performance by a model who has been viewed removing a selected article of clothing (claim 76); selection of a model from a plurality of models (claim 80); or selection of a second model after a first model has completed clothing removal (claim 81). Withdrawal of the §103 rejections of these claims is therefore earnestly solicited.

Again, applicants direct the PTO's attention to the article published in the journal XBiz World (January 2007, page 12), submitted previously, which describes the development of a commercial product which appears to read directly on one or more claims of the present application. Applicants are compelled to reiterate that the published report of the "Naughty American History" application constitutes an objective indicium of unobviousness sufficient to rebut any hypothetical case of obviousness (which applicants once again deny) based on the Rachman et al., Jenkins et al, and Billy Madison disclosures.

Accordingly, applicants submit that none of the present claims are rendered obvious by the combined teachings of Rachman et al., Jenkins et al., and Billy Madison. Withdrawal of the §103(a) rejections of the present claims on this basis is earnestly solicited.

In view of the foregoing remarks, it is submitted that all present claims are in condition for allowance. Should the Examiner have any questions, she is invited to contact the undersigned at the telephone number indicated.

Respectfully submitted,

  
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4/14/2010  
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